

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 20-20346-CMB
Vance Strader	: Chapter 13
Debtor	:
	:
U.S. Bank National Association, as indenture	:
trustee, for the holders of the CIM Trust 2017-	: Doc #
4, Mortgage-Backed Notes, Series 2017-4 c/o	:
Select Portfolio Servicing, Inc.	: Related to Doc #25
Movant	:
vs.	: Hearing date/time: N/A
	:
Vance Strader	:
Debtor/Respondent	:
and	:
Ronda J. Winnecour, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN DATED 3/9/2020**

U.S. Bank National Association, as indenture trustee, for the holders of the CIM Trust 2017-4, Mortgage-Backed Notes, Series 2017-4 c/o Select Portfolio Servicing, Inc. (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Vance Strader (“Debtor”), as follows:

1. As of the bankruptcy filing date of January 30, 2020, Movant holds a secured Claim against the Debtor’s property located at 432 Ella Street, Pittsburgh, PA 15221.
2. Movant is in the process of filing a Proof of Claim by the 04/09/2020 bar date, with an estimated secured claim in the amount of \$29,893.93, and estimated pre-petition arrears in the amount of \$8,612.02.
3. The Plan currently proposes payment to Movant in the amount of \$0.00 for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 03/11/2020

/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521/Fax 215-855-9121  
debersole@hoflawgroup.com

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and	:
Ronda J. Winnecour, Esquire	:
Trustee/Respondent	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for U.S. Bank National Association, as indenture trustee, for the holders of the CIM Trust 2017-4, Mortgage-Backed Notes, Series 2017-4 c/o Select Portfolio Servicing, Inc. ("Movant"), certify that I served a copy of the attached Objection to the Plan to the parties below on 03/11/2020:

Ronda J. Winnecour, Esquire  
Via ECF:  
cmecf@chapter13trusteedpa.com  
*Trustee*

Vance Strader  
231 Yosemite Drive  
Pittsburgh, PA 15235  
Via First Class Mail  
*Pro Se Debtor*

Respectfully Submitted,

Date: 03/11/2020

/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
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	:	
Vance Strader	:	
Debtor/Respondent	:	
and	:	
Ronda J. Winnecour, Esquire	:	
Trustee/Respondent	:	

**ORDER**

Upon consideration of U.S. Bank National Association, as indenture trustee, for the holders of the CIM Trust 2017-4, Mortgage-Backed Notes, Series 2017-4 c/o Select Portfolio Servicing, Inc.'s Objection to Confirmation of the proposed Plan, and having heard the argument of counsel and for good cause having been shown;

It is on this \_\_\_\_\_ day of \_\_\_\_\_, 2020 ORDERED that the Confirmation is DENIED.

BY THE COURT:

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Honorable Carlota M. Bohm  
Chief United States Bankruptcy Judge